



FRED WILLIAMSON & ASSOCIATES, INC.
Telecommunications Management Services

VIA ECFS

June 27, 2014

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of Secretary
445 12th Street, S. W.
Washington, D.C. 20554

RE: Submission of information Pursuant to FCC 54.313 Rules and Request for Confidential Treatment – Connect America Fund, WC Docket No. 10-90; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Totah Communications, Inc. ("Totah"), Oklahoma, Study Area Code 432030, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 11-42. Totah, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan identified on Form 100, Line 112 and (2) the financial annual report identified on Form 3005, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's November 16, 2012 Protective Order in WC Docket No. 10-90 et al. These attachments contain competitively sensitive data that Totah maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

Totah is also transmitting the following information to the Commission in compliance with C.F.R. §§54.313 and 54.422:

- Submission to the Office of the Secretary, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection. Confidential information has been designated in accordance with Confidentiality guidelines and the Protective Order.
- Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing.
- Two copies of this cover letter and the Form 481 filing with the confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481. Totah requests that the information contained in its five-year service quality improvement plan be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company. Totah offers the following information pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan. Specifically, confidential treatment is sought for all information in the five-year plan related to the Company's future network plans and information concerning future services provided to customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket Nos. 10-90 and 11-42 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a five-year service quality improvement plan, pursuant to 47 C.F.R. §§54.202(a)(1)(ii) and 54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan contains information on the Company's future plans, number of customers served and other planning information that company does not make publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more Internet service providers.

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan would provide competitors with detailed, granular information regarding the Company's strategic plans. This would provide competitors access to confidential information they could employ to develop their own plans a particular service area. This could cause competitive harm to the Company.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

REDACTED FOR PUBLIC INSPECTION

The Company has continually treated information regarding its network and service plans as confidential and carefully controls the information to protect it from competitors.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan is not available to the public, and third party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. The five year planning period information would provide valuable information to competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Please contact me if you have any questions.

Sincerely,



Tim Morrissey
President
314-605-9220
tmorrissey@fwainc.com

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, (2 hardcopies of confidential submission)

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	432030
<015> Study Area Name	TOTAH COMMUNICATIONS
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	PETER DEIBERT
<035> Contact Telephone Number: Number of the person identified in data line <030>	9185352208 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	DIE_BERT@TOTELECSI.COM

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; height: 40px; width: 300px;"></div> 432030OK510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; height: 40px; width: 300px;"></div> 432030OK610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 40px; width: 300px;"></div> 432030OK1010.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting Data Collection Form	
FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	

<010>	Study Area Code	432030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	PETER DELBERT
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	DIE_BERT@TOTELCSI.COM
<110>	Has your company received its ETC certification from the FCC?	<input checked="" type="radio"/> (yes / no)
<111>	If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<input type="radio"/> (yes / no)

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

4320300K112-Confidential.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	<input type="checkbox"/>
<114>	Report how much universal service (USF) support was received	<input type="checkbox"/>
<115>	How (USF) was used to improve service quality	<input type="checkbox"/>
<116>	How (USF) was used to improve service coverage	<input type="checkbox"/>
<117>	How (USF) was used to improve service capacity	<input type="checkbox"/>
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="checkbox"/>

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	PETER DEIBERT
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	DIE_BERT@TOTELCSI.COM

<910>	Tribal Land(s) on which ETC Serves	Former Tribal Lands - Osage Nation & Cherokee Nation, including the sub-tribe of the Delaware.
<920>	Tribal Government Engagement Obligation	432030OK920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	Select (Yes, No, NA)
<922>	Feasibility and sustainability planning;	NA
<923>	Marketing services in a culturally sensitive manner;	NA
<924>	Compliance with Rights of way processes	NA
<925>	Compliance with Land Use permitting requirements	NA
<926>	Compliance with Facilities Siting rules	NA
<927>	Compliance with Environmental Review processes	NA
<928>	Compliance with Cultural Preservation review processes	NA
<929>	Compliance with Tribal Business and Licensing requirements.	NA

(1100) No Terrestrial Backhaul Reporting

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	PETER DEIBERT
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	DIE_BERT@TOTELECSI.COM

☐

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

(1200) Terms and Condition for Lifeline Customers		FCC Form 481
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form		July 2013

<010>	Study Area Code	432030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	PETER DEIBERT
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	DIE_BERT@TOTELCSI.COM

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div>432030OK1210.pdf</div>	Name of Attached Document
<1220>	Link to Public Website	HTTP	www.totelcsi.com/lifeline-link

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<010>	Study Area Code	432030
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<039>	Contact Email Address - Email Address of person identified in data line <030>	DIE_BERT@TOTELCSI.COM

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}	<input type="checkbox"/>
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}	<input type="checkbox"/>
Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}		
<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}		
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
Connect America Phase II Reporting {47 CFR § 54.313(e)}		
<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	

<2021>	Interim Progress Community Anchor Institutions	<div></div>
		Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	DIE_BERT@TOTALCSL.COM

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(ii))	<div></div> <div>Name of Attached Document Listing Required Information</div>
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<div></div>
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))	<div></div> <div>Name of Attached Document Listing Required Information</div>
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<div><div><div></div><div></div><div></div></div><div>(Yes/No)</div></div>
(3014)	If yes, does your company file the RUS annual report	<div><div><div></div><div></div><div></div></div><div>(Yes/No)</div></div>
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<div><div><div></div><div></div><div></div></div><div></div></div>
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><div><div></div><div></div><div></div></div><div></div></div>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<div><div><div></div><div></div><div></div></div><div>432030K3017_Confidential.pdf</div><div>Name of Attached Document Listing Required Information</div><div>(Yes/No)</div></div>
(3018)	If the response is no on line 3014, Is your company audited?	<div><div><div></div><div></div><div></div></div><div>(Yes/No)</div></div>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<div><div><div></div><div></div><div></div></div><div></div></div>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><div><div></div><div></div><div></div></div><div></div></div>
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.	<div><div><div></div><div></div><div></div></div><div></div></div>
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<div><div><div></div><div></div><div></div></div><div></div></div>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<div><div><div></div><div></div><div></div></div><div></div></div>
(3024)	Underlying information subjected to an officer certification.	<div><div><div></div><div></div><div></div></div><div></div></div>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><div><div></div><div></div><div></div></div><div></div></div>
(3026)	Attach the worksheet listing required information	<div></div> <div>Name of Attached Document Listing Required Information</div>

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432030
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<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	DIE_BERT@TOTELCSI.COM

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: TOTAH COMMUNICATIONS	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/27/2014
Printed name of Authorized Officer: KEITH WATSON	
Title or position of Authorized Officer: EXECUTIVE VP / CONTROLLER	
Telephone number of Authorized Officer: 9185352208 ext.	
Study Area Code of Reporting Carrier: 432030	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	432030
<015> Study Area Name	TOTAH COMMUNICATIONS
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<030> Contact Name - Person USAC should contact regarding this data	PETER DEIBERT
<035> Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext .
<039> Contact Email Address - Email Address of person identified in data line <030>	DIE_BERT@TOTE LCSI .COM

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

<010>

Study Area Code

432030

<015>

Study Area Name

TOTAH COMMUNICATIONS

<020>

Program Year

2015

<030>

Contact Name - Person USAC should contact regarding this data

PETER DEIBERT

<035>

Contact Telephone Number - Number of person identified in data line <030>

9185352208 ext.

<039>

Contact Email Address - Email Address of person identified in data line <030>

DIE_BERT@TOTELCSI.COM

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service Download Speed (Mbps)	Broadband Service Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	OK	Talala	29.5	0.0	29.5	0.512	0.384	999.0	Other, No Usage Limit
	OK	Talala	39.0	0.0	39.0	0.768	0.512	999.0	Other, No Usage Limit
	OK	Talala	48.0	0.0	48.0	1.0	0.768	999.0	Other, No Usage Limit
	OK	Talala	65.0	0.0	65.0	2.0	1.0	999.0	Other, No Usage Limit
	OK	South Elgin	29.5	0.0	29.5	0.512	0.384	999.0	Other, No Usage Limit
	OK	South Elgin	39.0	0.0	39.0	0.768	0.512	999.0	Other, No Usage Limit
	OK	South Elgin	48.0	0.0	48.0	1.0	0.768	999.0	Other, No Usage Limit
	OK	South Elgin	65.0	0.0	65.0	2.0	1.0	999.0	Other, No Usage Limit
	OK	Lenapah	29.5	0.0	29.5	0.512	0.384	999.0	Other, No Usage Limit
	OK	Lenapah	39.0	0.0	39.0	0.768	0.512	999.0	Other, No Usage Limit
	OK	Lenapah	48.0	0.0	48.0	1.0	0.768	999.0	Other, No Usage Limit
	OK	Lenapah	65.0	0.0	65.0	2.0	1.0	999.0	Other, No Usage Limit
	OK	Wann	29.5	0.0	29.5	0.512	0.384	999.0	Other, No Usage Limit
	OK	Wann	39.0	0.0	39.0	0.768	0.512	999.0	Other, No Usage Limit
	OK	Wann	48.0	0.0	48.0	1.0	0.768	999.0	Other, No Usage Limit
	OK	Wann	65.0	0.0	65.0	2.0	1.0	999.0	Other, No Usage Limit
	OK	Ochelata	29.5	0.0	29.5	0.512	0.384	999.0	Other, No Usage Limit
	OK	Ochelata	39.0	0.0	39.0	0.768	0.512	999.0	Other, No Usage Limit
	OK	Ochelata	48.0	0.0	48.0	1.0	0.768	999.0	Other, No Usage Limit
	OK	Ochelata	65.0	0.0	65.0	2.0	1.0	999.0	Other, No Usage Limit
	OK	Oglesby	29.5	0.0	29.5	0.512	0.384	999.0	Other, No Usage Limit

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	PETER DEIBERT
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	DIE_BERT@TOTELCOSI.COM
<810>	Reporting Carrier	Totah Communications
<811>	Holding Company	
<812>	Operating Company	

[illegible]

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TOTAH COMMUNICATIONS, INC.
FIVE-YEAR QUALITY IMPROVEMENT PLAN
(USAC DOCUMENT - 432030OK112.PDF)

Title 47 §54.202(a)(1)(ii)
Five-Year Plan
Due: July 1, 2014

Company Name: Totah Communications, Inc. - Oklahoma
Company Headquarters: Ochelata, OK

Narrative

Pursuant to FCC order DA 13-1115 dated May 16, 2013 and consistent with Title 47 Section 54.202(a)(1)(ii), Totah Communications, Inc. plans to make improvements as well as maintain and support existing broadband infrastructure throughout its proposed service areas as described herein. Totah Communications, Inc.'s Oklahoma service area includes the exchanges of Talala, Ochelata, Oglesby, Wann, Lenepah, Burbank, South Elgin and South Hewins in Oklahoma.

Per the USAC reminder dated February 27, 2014 and the NECA reminder dated March 10, 2014, the initial five-year build out plan includes: (1) specific proposed improvements or upgrades to the network planned for 2015-2019, (2) an estimate of the area and population that will be served as a result of the improvements and (3) to the extent no improvements are planned, the five-year plans should so indicate.

Totah Communications, Inc. 5 Year Plan – Oklahoma



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TOTAH COMMUNICATIONS, INC.

QUALITY OF SERVICE AND CUSTOMER PROTECTION PROCESS

(USAC DOCUMENT - 432030OK510.PDF)

TOTAH COMMUNICATIONS, INC.

QUALITY OF SERVICE & CUSTOMER PROTECTION PROCESSES

1. **Available Customer Service Representatives to Answer Phones** – All calls received by TOTAH COMMUNICATIONS, INC. during business hours are generally answered by the third ring. When the assigned customer representatives are unable to answer calls by the third ring, calls roll to our out sourced customer service help desk center.
2. **Provide After Hours Emergency Customer Service** – Calls are generally answered within 60 seconds. Call logs are reviewed daily by personnel. Customer service representatives have been given a list of questions by TOTAH COMMUNICATIONS, INC. to ask to assist them in resolving any issues. Unresolved issues are reviewed the following work day. Issues requiring immediate attention are sent to the TOTAH COMMUNICATIONS, INC. service technician on call, who works to resolve the matter as quickly as possible. If that technician is unable to resolve the problem, additional technicians are called. After-hours customer service is also available through our out sourced answering service 24/7.
3. **Provide a 24/7 Hour Internet Help Desk Service** – All calls are generally answered within 60 seconds. Call logs are reviewed daily by personnel with Managers available to review and address any issues.
4. **Give Customers Cut-off Warnings & Provide Bill Arrangement Opportunities** - Customers are given two months of missed payments before their service is cut off for non-payment of bill. Notification of the payment due date and the cut-off date are prominently displayed on bills as well as of the opportunity to make payment arrangements to avoid being cut-off. Customers in danger of losing service also receive an automated call from a customer service representative to remind them of the late payment. If a customer complains that notice was not given, they are directed to speak with a Manager who will work to resolve the matter and prevent it from occurring again. Account balance reports are printed monthly internally using the company's billing system.
5. **Ensure That All New Service Installation Orders Are Fulfilled Promptly** – All customers are contacted within 48 hours regarding scheduling the new service installation. If outside plant is already in place, we fill the order at the customers' earliest convenience; if outside plant is in not in place, fill the order as soon as the weather permits.
6. **Minimize Customer Downtime for Services & Make Requested Changes Promptly** – Contact customers regarding all service requests the same day, with a goal of resolving all issues within 48 hours. Any unresolved issues will be resolved contingent upon the technician/customer coordination of access to the premises. Changes requiring key strokes are many times made within the same day as requested.
7. **Proactively Monitoring in Case of Major Service Outages** – Generally, Service technicians are made aware of outages affecting customers within an hour. It is the goal of TOTAH COMMUNICATIONS, INC. to resolve major outages within four hours or less. If an outage cannot be resolved within four hours, technicians will begin utilizing all resources, both from within and from without. Technicians establish and accomplish yearly training goals to be better equipped for managing all services.

CUSTOMER PRIVACY

Company Confidential Information Policy – TOTAH COMMUNICAITONS, INC. has a company policy in place that holds employees accountable for a breach of confidentiality concerning customer data and company information. The policy states: “You are reminded that revealing any type of confidential information to unauthorized persons or tampering with or altering company records and/or property is a violation of trust that can result in disciplinary action up to and including discharge.”

Company CPNI Policy – TOTAH COMMUNICATIONS, INC. also has a Customer Proprietary Network Information (CPNI) policy in place that ensures employee compliance with the FCC’s CPNI guidelines. Outlined within the policy is a detailed description of CPNI as well as both acceptable and unacceptable CPNI practices. Employees are required to sign waivers stating they understand and agree to comply with the policy and acknowledge that “failure to protect this information result in disciplinary action up to and including discharge for the responsible employee.” As a part of this policy, TOTAH COMMUNICAITONS, INC. has designated a Compliance Officer responsible for training employees, monitoring CPNI related activities, and reporting breaches.

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TOTAH COMMUNICATIONS, INC.

EMERGENCY SITUATION FUNCTIONALITY – AVAILABILITY OF BACK UP POWER

(USAC DOCUMENT - 432030OK610.PDF)

**Totah Communications, Inc.
Emergency Response Plan
(Restoration of Service)**

CONTACT LIST

Name & Title	Office#
Mark M. Gailey mmgailey@totelcsi.com President & General Manager	918-535-2208
Dusty Harper dusty@totelcsi.com Supervisor OSP Construction	918-535-2208
Keith E. Watson kewatson@totelcsi.com Exec. VP/Controller	918-535-2208

Oklahoma Corporation Commission Contact List

Consumer Services Division	Office
Kim Dobbins – Primary Contact k.dobbins@occcemail.com	405-522-4544

Purpose

The primary purpose of this Emergency Response Plan (the “Plan”) is to set forth general guidelines, policies and procedures to be taken in the case of an emergency as defined below to enable Totah Communications, Inc. (the “Company”) to secure expeditious restoral of service first to local emergency management agencies and then to Company customers in the event of such emergency.

Scope

This Plan, in compliance with OAC 165:55-13-53 of the Oklahoma Corporation Commission (OCC) Rules, shall be followed to the extent possible in the event of an emergency which, for purposes of this Plan, shall be defined as: (1) service interruptions of such magnitude that conditions affect the entire Company system or a major division thereof; or (2) a situation which, in the judgment of Company management, may cause a high degree of public interest or concern. The conditions which would require use of these procedures are collectively referred to herein as “emergency,” “emergency condition” or “emergency situation.”

This Plan recognizes that each emergency will present challenges specific to the situation, but the same general recovery steps should be followed during each emergency. An Emergency Response Team will be established during each emergency to direct the recovery process.

Emergency Response Team

In the event of an emergency, an Emergency Response Team will be established. An Emergency Response Team Coordinator will be designated, and shall be the highest-ranking Company management employee available. Members of the Emergency Response Team will be selected by the Coordinator based upon an assessment of the critical skills and knowledge necessary as they relate to the emergency.

FUNCTIONS OF THE EMERGENCY RESPONSE TEAM

The functions of the Emergency Response Team shall include the following:

I. GENERAL FUNCTIONS

- (A) Make an initial assessment of the extent of the service interruption in order to comply with the reporting requirements of OAC 165:55-13-52(b)(1);
- (B) Determine if the service interruption can be restored by the use of in-house personnel only or whether outside resources will be required;
- (C) Provide priority consideration to restoration of service, where feasible, to emergency services (911/E911 services, hospitals, law enforcement and fire fighting entities);
- (D) Make immediate assessments of the restoration of service in order to comply with the requirements of OAC 165:55-13-52(b)(2); and,
- (E) Make a conclusory assessment of the restoration of service in order to comply with the requirement of OAC 165:55-13-52(b)(3).

II. SPECIFIC FUNCTIONS

A. Communications

The Emergency Response Team Coordinator will, as soon as is practical and feasible, insure the contact is made with the OCC through the Consumer Services Division – Mr. Bill White (via phone 405-522-4538, emergency cell phone 405-659-7520 or b.white@occemail.com). If Mr. White is not available, contact is to be made with Mr. Rodney Poff (via phone 405-522-6166, emergency cell phone 405-659-7520 or rpoff@occemail.com). Such notifications will, where possible, consist of the following information and will be provided as soon as information is available:

- 1) Initial Contact
 - a) Notify OCC of outage;
 - b) Notify OCC of cause of the outage;
 - c) Notify OCC of the area affected; and,
 - d) Notify OCC of the estimated time for repair.
- 2) Intermediate Contact
 - a) Provide status reports as deemed necessary by the Emergency Response Team Coordinator or as requested by the OCC.
- 3) Conclusory Contact
 - a) Final contact advising the OCC of restoral of service.

In addition to the communication responsibilities listed above, the Emergency Response Team Coordinator will insure that contact is made with all appropriate and necessary employees in the affected area and instruct them where to report for purpose of expediting restoration of service.

B. Damage Assessment

The Emergency Response Team will have the duty of assessing the damage to all Company buildings and outside plant facilities. The Team will also be in charge of determining power outages. The Coordinator will be responsible for the coordination of restoration of power either commercially or with the use of standby generators, and also for the coordination of outside contractors which may be utilized by the Company if and when necessary for the restoration of service. The Coordinator will also maintain a list of the contact names and phone numbers where backup generators may be available.

C. Priority of Restoration

The Emergency Response Team will be responsible for giving priority for restoration of service to the local emergency management agencies (i.e. Police, Fire, Hospital, and 911 Center). The Emergency Response Team will restore access to toll service in the event of a toll outage. The Coordinator will also cooperate with emergency agencies for the clearing downed lines and poles from roadways. After service has been restored to all local emergency management agency locations, this team will begin the task of restoring service to all Company customers affected by the emergency.

III. COMPANY EMPLOYEES

The Company believes it is the responsibility of each employee that is a member of the Emergency Response Team to secure his/her family first and then report to the Company. Employees deemed critical to the restoration process will be directed to report to the location requiring their particular skills and expertise.

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TOTAH COMMUNICATIONS, INC.

VOICE SERVICES RATE COMPARABILITY

(USAC DOCUMENT - 432030OK1010)

Voice Services Rate Comparability

Total Communications, Inc - Oklahoma

In compliance with the 54.313 Rules, Total Communications, Inc – Oklahoma must certify that its current rate for fixed voice services is no more than two standard deviations above the national average urban rate for voice service. According to the 2014 Urban Rate Survey conducted by the FCC Wireline Competition Bureau, the weighted average unlimited local rate is \$20.46. ¹ USAC Guidelines (Page 56) provide that two standard deviations above the \$20.46 would be \$46.96. ²

The rates shown on the Voice Pricing Form (0700) are below \$46.96. Consequently, Total Communications, Inc - Oklahoma meets the above mentioned requirement.

¹ <http://www.fcc.gov/encyclopedia/urban-rate-survey-data>

² www.usac.org/_res/documents/hc/pdf/forms/FCC-Form-481-Online-User-Guide.pdf

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TOTAH COMMUNICATIONS, INC.

LIFELINE PLAN

(USAC DOCUMENT - 432030OK1210.PDF)

TOTAH COMMUNICATIONS, INC. - OKLAHOMA
LIFELINE/LINKUP AMERICA ON TRIBAL LANDS PROGRAM
AUTHORIZATION AND CERTIFICATION FORM

You are required to complete and sign this certification form in order to enroll you in Totah Communications, Inc.'s (Totah) "Enhanced" Lifeline and/or "Expanded" LinkUp programs as approved by the Federal Communications Commission (FCC). This authorization is only for the purpose of verifying your participation in these programs and will not be used for any other purpose.

THE BENEFITS YOU RECEIVE UNDER THE ENHANCED LIFELINE/LINKUP PROGRAM WILL TERMINATE ON MAY 31, 2014, UNLESS YOU COMPLETE ANOTHER AUTHORIZATION AND CERTIFICATION FORM WITHIN THIRTY DAYS OF JUNE 1, 2014 (2015 LIFELINE PROGRAM) AND RETURN IT TO TOTAH COMMUNICATIONS, INC.

A. YOU MUST MEET PROGRAM PARTICIPATION REQUIREMENTS OR HOUSEHOLD INCOME REQUIREMENTS

1. I hereby certify that I participate in at least one of the following programs (**CHECK ALL THAT APPLY**) OR my household income is at or less than 135% of the federal poverty level:

____ Supplemental Nutrition Assistance Program (SNAP a/k/a Food Stamps)
____ Temporary Assistance for Needy Families (TANF)
____ Supplemental Security Income (SSI)
____ Medical Assistance (Medicaid/*SoonerCare*)
____ Vocational Rehabilitation (including aid to the hearing impaired)
____ Oklahoma Sales Tax Relief
____ Food Distribution Program on Indian Reservations ("FDPIR")
____ Federal Public Housing
____ Low Income Energy Assistance Program
____ Bureau of Indian Affairs General Assistance
____ Temporary Assistance for Needy Families (TANF) Tribally-administered block grant programs
____ Head Start Programs (only applicant or customer who satisfy the income qualifying eligibility provision)
____ National School Lunch Program (only applicant or customer who satisfy the income standard of the program for free meals)

OR

____ My household income is at or less than 135% of the federal poverty level. There are ____ individuals in my household. Customer must provide sufficient proof of income as set forth in 47 CFR §54.400(f).

B. YOU MUST MEET THE "ONE PER HOUSEHOLD" REQUIREMENT

- **ONLY ONE PERSON IN A HOUSEHOLD CAN QUALIFY TO RECEIVE PROGRAM BENEFITS.**
- **A "HOUSEHOLD" IS ANY INDIVIDUAL OR GROUP OF INDIVIDUALS WHO LIVE TOGETHER AT THE SAME ADDRESS AND SHARE INCOME AND EXPENSES.**
- **ONLY ONE RESIDENCE TELEPHONE SERVICE IN A HOUSEHOLD CAN RECEIVE PROGRAM SUPPORT.**
- **A HOUSEHOLD MAY NOT RECEIVE LIFELINE/LINKUP BENEFITS FROM MULTIPLE SERVICE PROVIDERS.**

____ *My initials here certify that my household meets the one-per-household requirement. I understand that falsely certifying eligibility is a violation of the rules of the Federal Communications Commission and will result in my removal from the Lifeline/LinkUp Program and could result in criminal prosecution by the United States government.*

Do you live at an address at which there are multiple households (for example, a nursing home or group home)?

____ Yes (If yes, you must complete a supplemental form to determine your eligibility.)
____ No

C. YOU MUST ACKNOWLEDGE AND CERTIFY THE FOLLOWING STATEMENTS AND NOTIFICATION OBLIGATIONS (*You must read and initial all statements below to acknowledge and certify you understand your obligations.*)

- _____ I certify that the telephone service location to which this certification applies is my primary/temporary (circle one) residential service address located at _____, and to the best of my knowledge this residential service address is located on former tribal land/reservation (as defined in 25 CFR § 20.1(v)).
- _____ I also certify that if the address identified above is a temporary one, I will recertify my temporary residential address every 90 days.
- _____ I also certify that if in the future, I no longer live at the address identified above, I will notify Totah Communications, Inc. within 30 days.
- _____ I also certify that if in the future, I no longer participate in or qualify for at least one of the programs listed in item A.1 above or conditions change in any way, I will notify Totah Communications, Inc. within 30 days.
- _____ I also certify that I will notify Totah Communications, Inc. within 30 days if I no longer live at the address identified above.
- _____ I also certify that:
- _____ a. The telephone service which I am requesting receipt of Lifeline and/or LinkUp benefits for is listed in my name.
- _____ b. I am 18 years of older and am not claimed as a dependent on another person's tax return.
- _____ c. The above service address is my primary/temporary residence, not a second home or business.
- _____ d. My household will receive only one Lifeline/LinkUp service and, to the best of my knowledge, my household is not already receiving a Lifeline/LinkUp service.

D. YOU MUST ACKNOWLEDGE THE FOLLOWING STATEMENTS (*You must read and initial all statements below to acknowledge your understanding of the actions of Totah Communications, Inc., you hereby authorize.*)

- _____ I authorize Totah Communications, Inc. or its duly appointed representative to access any records required to verify these statements in order to confirm my continued participation in the above program. I authorize representatives of the above programs to discuss with and/or provide copies to Totah Communications, Inc., if requested by the company, to verify my participation in the above program and my eligibility for "Enhanced" Lifeline or "Expanded" LinkUp benefits.
- _____ I authorize Totah Communications, Inc. to transmit to the Administrator of the National Lifeline Accountability Database my full name, my full residential address, my date of birth, and the last four digits of my Social Security Number or Tribal Identification Number, the telephone number to be associated with Lifeline/LinkUp Program benefits, the date on which Lifeline/LinkUp service is begun, the date on which Lifeline/LinkUp Program benefits end, the amount of support sought by the Company and the means through which I qualify for Program benefits. I understand that transmission of this information is required to ensure the proper administration of the Lifeline/LinkUp Program. I also understand that if I refuse to have this information transmitted to the Administrator, I will be denied Program benefits.

D. CUSTOMER/APPLICANT INFORMATION

Applicant's Name _____

Applicant's Billing Address, if different than identified above _____

Home Phone Number () _____ Work Phone Number() _____
(Your contact number during weekdays between 8 a.m. and 5 p.m.)

Social Security Number (SSN) (last four digits) or Tribal identification number if you do not have a SSN: _____

Date of Birth _____

When returning Lifeline form and proof we will also need a copy of photo Id of person who qualifies.

I AFFIRM, UNDER PENALTY OF PERJURY, THAT THE FOREGOING REPRESENTATIONS ARE TRUE AND THAT PROVIDING FALSE OR FRAUDULENT INFORMATION TO RECEIVE LIFELINE/LINKUP BENEFITS IS PUNISHABLE BY LAW.

Signature of benefit recipient

Date

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Federal Poverty Guideline Certification Form - OKLAHOMA
Page 1 of 2

I certify that all the income actually received by all members of my household is less than or equal to 135% of the federal poverty level, as set forth below. I understand a "household" is any individual or group of individuals who live together at the same address and share income and expenses. I have provided the documentation verifying the income in the categories checked below to Totah Communications, Inc. in support of my application for Lifeline/LinkUp discounted service. I certify that there are members of my household living with me at the address listed below. I also certify that I will notify Totah Communications, Inc. within 30 days if my household income exceeds 135% of the Federal Poverty Guidelines. I further certify that the Company representative returned all my documentation to me after reviewing. I make these certifications under penalty of perjury, punishable by law.

Print Name of applicant: _____ Phone#: _____
Home Address: _____

Signed: _____ Date: _____

Federal law at 47 C.F.R. §54.400(f) has defined "income"¹ for purposes of eligibility for Lifeline Assistance as all income actually received by all members of the household and includes the following. Please check all the categories of "income" that members of your household currently receive.

_____ Salary before deductions for taxes	_____
_____ Public Assistance benefits	_____
_____ Social Security payments	_____
_____ Pensions	_____
_____ Unemployment compensation	_____
_____ Veteran's Benefits	_____
_____ Inheritances	_____
_____ Alimony	_____
_____ Child Support Payments	_____
_____ Worker's Compensation Benefits	_____
_____ Gifts	_____
_____ Lottery Winnings	_____
_____ Other _____	_____

135% of the 2014 federal poverty level guidelines² are as follows:

Persons In Household	Annual household income no higher than:
1	\$15,755
2	\$21,236
3	\$26,717
4	\$32,198
5	\$37,679
6	\$43,160
7	\$48,641
8	\$54,122

(For each additional person, add: \$5,481)

¹ The only exceptions to "income" are student financial aid, military housing and cost-of-living allowances, irregular income from occasional small jobs such as baby-sitting or lawn mowing, and the like.

² This information is regularly updated by the Federal Government.

For Company Use Only

Name of Employee Who Reviewed Income Documentation: _____

Type of Income Documentation received from applicant: _____

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TOTAH COMMUNICATIONS, INC.

TRIBAL LANDS REPORTING

(USAC DOCUMENT - 432030OK920.PDF)



**TOTAH
COMMUNICATIONS, INC.**

Since 1954

P.O. BOX 300

OCHELATA, OK 74051-0300

888-580-2208

918-535-2208

Principal Chief of the Cherokee Nation
Chief Bill John Baker
P.O. Box 948
Tahlequah, OK 74465

February 11, 2014

COPY

Dear Chief Baker:

Totah Communications, Inc. is a rural independent telephone company providing service to approximately 1,400 customers and 750 square miles of in Osage, Washington, Nowata, and Rogers counties of Northeast Oklahoma. Included in our exchanges are customers who may be members of the Cherokee Nation and the Delaware Tribe. Totah offers landline phone, DSL, long distance, Conference Bridging, and access to toll free services as well as opportunities to bundle these services together.

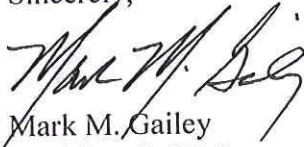
We currently provide services to several local community anchor institutions. Many of these, receive a free or discounted rate for high speed internet through federal and/or state assistance programs. This partnership allows the institutions the ability to have connectivity worldwide. Totah believes that anchor institutions are an integral part of the community and provide countless benefits and gathering places to area residents. Totah has the ability to provide service upon reasonable request to anyone in its service area including Tribal community anchor institutions. As you may know, we currently serve the Cherokee Casino in Ramona and will serve the medical clinic in Ochelata that is now under construction.

We are currently deploying fiber in order to increase the broadband speeds and reliability of its services. Through various partnerships and its position in both Kansas and Oklahoma, Totah has the ability to offer ever increasing internet speeds at competitive prices. These speeds allow customers to have access to services such as video streaming, telemedicine, offsite workplaces and remote study opportunities for education. Services such as these allow for the continued growth of connectivity in a rural landscape. This enables customers the ability to be connected to retail business and services throughout the country including those of urban areas.

Totah Communications, Inc also provides Lifeline and Link-Up service in areas it serves for customers that qualify under state and federal guidelines. Totah also offers toll limitation service which helps households save money by blocking toll calls from being made, thus preventing costly long distance bills.

As always, I welcome the opportunity to assist our current and future customers where possible. Please feel free to contact me with any questions that you may have at 918-535-2208 or toll free 888-580-2208.

Sincerely,



Mark M. Gailey
President & G.M.

COPY

Cc: Deputy Principal Chief S. Joe Crittenden



**TOTAH
COMMUNICATIONS, INC.**

Since 1954

P.O. BOX 300

OCHELATA, OK 74051-0300

888-580-2208

918-535-2208

Chief of the Delaware Tribe
Chief Paula Pechonick
170 NE Barbara
Bartlesville, OK 74006

February 11, 2014

Dear Chief Pechonick:

COPY

Totah Communications, Inc. is a rural independent telephone company providing service to approximately 1,400 customers and 750 square miles of in Osage, Washington, Nowata, and Rogers counties of Northeast Oklahoma. Included in our exchanges are customers who may be members of the Cherokee Nation and the Delaware Tribe. Totah offers landline phone, DSL, long distance, Conference Bridging, and access to toll free services as well as opportunities to bundle these services together.

We currently provide services to several local community anchor institutions. Many of these, receive a free or discounted rate for high speed internet through federal and/or state assistance programs. This partnership allows the institutions the ability to have connectivity worldwide. Totah believes that anchor institutions are an integral part of the community and provide countless benefits and gathering places to area residents. Totah has the ability to provide service upon reasonable request to anyone in its service area including Tribal community anchor institutions.

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Sincerely,



Mark M. Gailey
President & G.M.

COPY

Cc: Assistant Chief Chester "Chet" Brooks



**TOTAH
COMMUNICATIONS, INC.**

Since 1954

P.O. BOX 300

OCHELATA, OK 74051-0300

888-580-2208

918-535-2208

Principal Chief of the Osage
Chief Scott BigHorse
627 Grandview
Pawhuska, OK 74056

February 11, 2014

COPY

Dear Chief Red Eagle:

Totah Communications, Inc. is a rural independent telephone company providing service to approximately 1,400 customers and 750 square miles of in Osage, Washington, Nowata, and Rogers counties of Northeast Oklahoma. Included in our exchanges are customers who may be members of the Osage Nation. Totah offers landline phone, DSL, long distance, Conference Bridging, and access to toll free services as well as opportunities to bundle these services together.

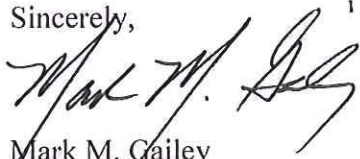
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As always, I welcome the opportunity to assist our current and future customers where possible. Please feel free to contact me with any questions that you may have at 918-535-2208 or toll free 888-580-2208.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark M. Gailey', with a small superscript '1' to the right.

Mark M. Gailey
President & G.M.

COPY

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TOTAH COMMUNICATIONS, INC.
CONSOLIDATED FINANCIAL STATEMENTS
(USAC DOCUMENT - 432030OK3017.PDF)

USDA-RUS

OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS

This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.

BORROWER NAME

Totah Telephone Company, Incorporated

(Prepared with Audited Data)

INSTRUCTIONS-Submit report to RUS within 30 days after close of the period.
For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.

PERIOD ENDING
December, 2013

BORROWER DESIGNATION
OK0536

CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.
ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.

DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII
(Check one of the following)

☒ All of the obligations under the RUS loan documents have been fulfilled in all material respects.

☐ There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report

Mark Gailey

5/8/2014

DATE

PART A. BALANCE SHEET					
ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents			25. Accounts Payable		
2. Cash-RUS Construction Fund			26. Notes Payable		
3. Affiliates:			27. Advance Billings and Payments		
a. Telecom, Accounts Receivable			28. Customer Deposits		
b. Other Accounts Receivable			29. Current Mat. L/T Debt		
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			31. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable			32. Income Taxes Accrued		
b. Other Accounts Receivable			33. Other Taxes Accrued		
c. Notes Receivable			34. Other Current Liabilities		
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)		
6. Material-Regulated			LONG-TERM DEBT		
7. Material-Nonregulated			36. Funded Debt-RUS Notes		
8. Prepayments			37. Funded Debt-RTB Notes		
9. Other Current Assets			38. Funded Debt-FFB Notes		
10. Total Current Assets (1 Thru 9)			39. Funded Debt-Other		
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development			42. Reacquired Debt		
b. Nonrural Development			43. Obligations Under Capital Lease		
12. Other Investments			44. Adv. From Affiliated Companies		
a. Rural Development			45. Other Long-Term Debt		
b. Nonrural Development			46. Total Long-Term Debt (36 thru 45)		
13. Nonregulated Investments			OTHER LIAB. & DEF. CREDITS		
14. Other Noncurrent Assets			47. Other Long-Term Liabilities		
15. Deferred Charges			48. Other Deferred Credits		
16. Jurisdictional Differences			49. Other Jurisdictional Differences		
17. Total Noncurrent Assets (11 thru 16)			50. Total Other Liabilities and Deferred Credits (47 thru 49)		
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
18. Telecom, Plant-in-Service			51. Cap. Stock Outstand. & Subscribed		
19. Property Held for Future Use			52. Additional Paid-in-Capital		
20. Plant Under Construction			53. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates		
22. Less Accumulated Depreciation			55. Other Capital		
23. Net Plant (18 thru 21 less 22)			56. Patronage Capital Credits		
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins		
			58. Total Equity (51 thru 57)		
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		

Total Equity = Total Assets

Borrower Designation
OK0536**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

PERIOD ENDING

December, 2013

INSTRUCTIONS- See RUS Bulletin 1744-2

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM
1. Local Network Services Revenues
2. Network Access Services Revenues
3. Long Distance Network Services Revenues
4. Carrier Billing and Collection Revenues
5. Miscellaneous Revenues
6. Uncollectible Revenues
7. Net Operating Revenues (1 thru 5 less 6)
8. Plant Specific Operations Expense
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)
10. Depreciation Expense
11. Amortization Expense
12. Customer Operations Expense
13. Corporate Operations Expense
14. Total Operating Expenses (8 thru 13)
15. Operating Income or Margins (7 less 14)
16. Other Operating Income and Expenses
17. State and Local Taxes
18. Federal Income Taxes
19. Other Taxes
20. Total Operating Taxes (17+18+19)
21. Net Operating Income or Margins (15+16-20)
22. Interest on Funded Debt
23. Interest Expense - Capital Leases
24. Other Interest Expense
25. Allowance for Funds Used During Construction
26. Total Fixed Charges (22+23+24-25)
27. Nonoperating Net Income
28. Extraordinary Items
29. Jurisdictional Differences
30. Nonregulated Net Income
31. Total Net Income or Margins (21+27+28+29+30-26)
32. Total Taxes Based on Income
33. Retained Earnings or Margins Beginning-of-Year
34. Miscellaneous Credits Year-to-Date
35. Dividends Declared (Common)
36. Dividends Declared (Preferred)
37. Other Debits Year-to-Date
38. Transfers to Patronage Capital
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]
40. Patronage Capital Beginning-of-Year
41. Transfers to Patronage Capital
42. Patronage Capital Credits Retired
43. Patronage Capital End-of-Year (40+41-42)
44. Annual Debt Service Payments
45. Cash Ratio [(14+20-10-11) / 7]
46. Operating Accrual Ratio [(14+20+26) / 7]
47. TIER [(31+26) / 26]
48. DSCR [(31+26+10+11) / 44]

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USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

OK0536

PERIOD ENDED

December, 2013

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

EXCHANGE	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
	B-1 (a)	R-1 (b)	BUSINESS (a)	RESIDENTIAL (b)	TOTAL (c)	TOTAL (including fiber) (a)	FIBER (b)
Wann							
Ochelata							
Oglesby							
Burbank							
South Elgin							
South Hewins							
Talala							
Lenapah							
Tyro							
Elgin							
Hewins							
Elk City							
Havana							
Liberty							
MobileWireless							
Route Mileage Outside Exchange Area							
Total							
No. Exchanges							

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USDA-RUS

**OPERATING REPORT FOR
TELECOMMUNICATIONS BORROWERS**

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION

OK0536

PERIOD ENDED

December, 2013

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

4. BROADBAND SERVICE

Details on Least Expensive Broadband Service								
EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Advertised Download Rate (Kbps) (d)	Advertised Upload Rate (Kbps) (e)	Price Per Month (f)	Standalone/Pckg (f)	Type Of Technology (g)
Wann								
Ochelata								
Oglesby								
Burbank								
South Elgin								
South Hewins								
Talala								
Lenapah								
Tyro								
Elgin								
Hewins								
Elk City								
Havana								
Liberty								
Total								

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USDA-RUS REDACTED FOR PUBLIC INSPECTION OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		BORROWER DESIGNATION OK0536			
INSTRUCTIONS- See RUS Bulletin 1744-2		PERIOD ENDING December, 2013			
PART D. SYSTEM DATA					
1. No. Plant Employees					
PART E. TOLL DATA					
1. Study Area ID Code(s) a. 412030 b. 432030 c. d. e. f. g. h. i. j. 		2. Types of Toll Settlements (Check one) Interstate: <input type="checkbox"/> Average Schedule <input checked="" type="checkbox"/> Cost Basis Intrastate: <input type="checkbox"/> Average Schedule <input checked="" type="checkbox"/> Cost Basis			
PART F. FUNDS INVESTED IN PLANT DURING YEAR					
1. RUS, RTB, & FFB Loan Funds Expended					
2. Other Long-Term Loan Funds Expended					
3. Funds Expended Under RUS Interim Approval					
4. Other Short-Term Loan Funds Expended					
5. General Funds Expended (Other than Interim)					
6. Salvaged Materials					
7. Contribution in Aid to Construction					
8. Gross Additions to Telecom. Plant (1 thru 7)					
PART G. INVESTMENTS IN AFFILIATED COMPANIES					
INVESTMENTS (a)	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year (b)	Income/Loss This Year (c)	Cumulative Investment To Date (d)	Cumulative Income/Loss To Date (e)	Current Balance (f)
1. Investment in Affiliated Companies - Rural Development					
2. Investment in Affiliated Companies - Nonrural Development					

<div>USDA-RUS</div> <div>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</div>	<div>REDACTED FOR PUBLIC INSPECTION</div> <div>BORROWER IDENTIFICATION OK0536</div> <div>PERIOD ENDING December, 2013</div>
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PART H. CURRENT DEPRECIATION RATES

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)

☒ YES

☐ NO

EQUIPMENT CATEGORY	DEPRECIATION RATE
1. Land and support assets - Motor Vehicles	
2. Land and support assets - Aircraft	
3. Land and support assets - Special purpose vehicles	
4. Land and support assets - Garage and other work equipment	
5. Land and support assets - Buildings	
6. Land and support assets - Furniture and Office equipment	
7. Land and support assets - General purpose computers	
8. Central Office Switching - Digital	
9. Central Office Switching - Analog & Electro-mechanical	
10. Central Office Switching - Operator Systems	
11. Central Office Transmission - Radio Systems	
12. Central Office Transmission - Circuit equipment	
13. Information origination/termination - Station apparatus	
14. Information origination/termination - Customer premises wiring	
15. Information origination/termination - Large private branch exchanges	
16. Information origination/termination - Public telephone terminal equipment	
17. Information origination/termination - Other terminal equipment	
18. Cable and wire facilities - Poles	
19. Cable and wire facilities - Aerial cable - Metal	
20. Cable and wire facilities - Aerial cable - Fiber	
21. Cable and wire facilities - Underground cable - Metal	
22. Cable and wire facilities - Underground cable - Fiber	
23. Cable and wire facilities - Buried cable - Metal	
24. Cable and wire facilities - Buried cable - Fiber	
25. Cable and wire facilities - Conduit systems	
26. Cable and wire facilities - Other	

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USDA-RUS		BORROWER DESIGNATION OK0536	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		PERIOD ENDED December, 2013	
		INSTRUCTIONS – See help in the online application.	
PART I – STATEMENT OF CASH FLOWS			
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)			
CASH FLOWS FROM OPERATING ACTIVITIES			
2. Net Income			
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities			
3. Add: Depreciation			
4. Add: Amortization			
5. Other (Explain)			
Changes in Operating Assets and Liabilities			
6. Decrease/(Increase) in Accounts Receivable			
7. Decrease/(Increase) in Materials and Inventory			
8. Decrease/(Increase) in Prepayments and Deferred Charges			
9. Decrease/(Increase) in Other Current Assets			
10. Increase/(Decrease) in Accounts Payable			
11. Increase/(Decrease) in Advance Billings & Payments			
12. Increase/(Decrease) in Other Current Liabilities			
13. Net Cash Provided/(Used) by Operations			
CASH FLOWS FROM FINANCING ACTIVITIES			
14. Decrease/(Increase) in Notes Receivable			
15. Increase/(Decrease) in Notes Payable			
16. Increase/(Decrease) in Customer Deposits			
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)			
18. Increase/(Decrease) in Other Liabilities & Deferred Credits			
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital			
20. Less: Payment of Dividends			
21. Less: Patronage Capital Credits Retired			
22. Other (Explain) Other Debits to RE			
23. Net Cash Provided/(Used) by Financing Activities			
CASH FLOWS FROM INVESTING ACTIVITIES			
24. Net Capital Expenditures (Property, Plant & Equipment)			
25. Other Long-Term Investments			
26. Other Noncurrent Assets & Jurisdictional Differences			
27. Other (Explain) Other Capital Expenditures (PP&E)			
28. Net Cash Provided/(Used) by Investing Activities			
29. Net Increase/(Decrease) in Cash			
30. Ending Cash			

Revision Date 2010

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USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION OK0536
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2013
NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	

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USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION OK0536
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2013
CERTIFICATION LOAN DEFAULT NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	